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August 2, 2019

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Friends of the Earth and Sierra Club, Complainant/Petitioner v. South Carolina Electric & Gas Company, Defendant/Respondent - **Docket No. 2017-207-E**

Request of the Office of Regulatory Staff for Rate Relief to South Carolina Electric & Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920 - **Docket No. 2017-305-E**

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Incorporated for Review and Approval of a Proposed Business Combination between SCANA Corporation and Dominion Energy, Incorporated, as May Be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans - **Docket No. 2017-370-E**

Dear Ms. Boyd:

In its approval of the merger between SCANA Corporation ("SCANA") and its subsidiary, South Carolina Electric and Gas, Inc. ("SCE&G")¹, and Dominion Energy, Inc. ("Dominion Energy") in Order No. 2018-804 (Docket Nos. 2017-207-E, 2017-305-E, and 2017-370-E), the Public Service Commission of South Carolina ("Commission") outlined a series of merger conditions that must be met by Dominion Energy and SCE&G (collectively referred to as the "Companies"). Among these conditions, the Companies were directed to "adopt and agree to adhere to a Code of Conduct ["Code"] developed in collaboration with the [South Carolina Office of Regulatory Staff ("ORS")]" with this Code being subject to Commission approval. Further, the Commission ordered that such Code fulfill the obligation of the Companies to "avoid the

¹ Subsequent to the merger, SCE&G became Dominion Energy South Carolina ("DESC") in April 2019. Absent specific references to SCE&G, the company will be referred to as DESC herein.

concealment, omission, misrepresentation, or nondisclosure of any material fact or information in any proceeding or filing before the Commission or ORS” (Order No. 2018-804, p. 102).

In keeping with this directive, ORS collaborated with DESC to review and make recommendations on DESC’s proposed Code, which DESC filed with this Commission on July 1, 2019.² DESC’s filed Code contains many positive aspects resulting from a good-faith collaborative effort between DESC and ORS. However, ORS recommends the Commission consider inclusion of similar customer protections as those afforded by the North Carolina Utilities Commission (“NCUC”) to North Carolina customers of Dominion Energy North Carolina (“DENC”) and Public Service Company of North Carolina, Inc. (“PSNC”).

ORS discussed these additional customer protections with the DESC; however, DESC declined to include these additional sections. ORS respectfully requests the Commission consider inclusion of the Code sections provided in the attached document. The rationale for each ORS recommendation and proposed language are provided therein.

Sincerely,



Andrew M. Bateman

Enclosure

cc: Joseph Melchers, Esquire (via E-mail)
All Parties of Record (via E-mail)

² See Code of Conduct filed in Docket Nos. 2017-370-E, 2017-207-E, and 2017-305-E.